

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

ROGER KRUEGER, et al.,

Plaintiffs,

v.

AMERIPRISE FINANCIAL, INC., et al.,

Defendants.

No. 11-CV-02781 (SRN/JSM)

PLAINTIFFS' MOTION TO CERTIFY CLASS ACTION

Plaintiffs Roger Krueger, Jeffrey Olson, Deborah Tuckner, Susan Wones, and Margene Bauhs move that the Court certify all claims in this action as a class action under Federal Rule of Civil Procedure 23(b)(1). Plaintiffs move that the class be defined as follows:

All current and former participants and beneficiaries of the Ameriprise 401(k) Plan who were affected by the breach of fiduciary duties alleged in Plaintiffs' complaint, excluding those individuals who breached their fiduciary duties as alleged in Plaintiffs' complaint.

Plaintiffs further move that they each be appointed as the representatives of this class and that their attorneys—Schlichter Bogard & Denton LLP—be appointed class counsel under Rule 23(g). The facts and law in support of this Motion are provided in the Memorandum In Support Of Plaintiffs' Motion To Certify Class Action, filed herewith.

Respectfully submitted,

DATE: October 1, 2013

s/ Michael A. Wolff
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